

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE

DR. Regina Jordan-Sadig
Plaintiff(s),

v.

State of TN et al.,
Defendant(s). and
Waste Management, Defendant

Case Number 3:25-cv-00288

Judge Judge Eli Richardson

Magistrate Judge _____

Plaintiff Opposition to Motion to Dismiss
(Type of Pleading)

Exhibits:

(A) Letter dated June 26, 2025 to Waste
Connections of Clarksville ATTN: Customer
Service REF: Billing for March 2021,
March 2023 and June 2025

(B) invoice # 6034-511047, \$3.00, 09/15/20
(DUE)

(C) invoice # 4562267, \$3.00, 10/05/20
(DUE)

(D) invoice # 4721808, \$11.00, 04/05/21
(DUE)

(E) invoice # 5515016W034, \$67.37, 04/05/23
(DUE)

(F) invoice # 5712646W034, \$80.36, 10/05/23
(DUE)

(G) payment for 6034-511047, 06/18/2025, \$82.08

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the (pleading)

Plaintiff's Opposition to
Motion to Dismiss

(Name)

(Address)

(Address)

(Address)

(Name)

(Address)

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(Name)

(Address)

(Address)

on the

20th

day of

June

2025

Continue -

Signature

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the (pleading)
has been served on:

*Plaintiff Opposition to
Motion to Dismiss*

(Name)

IN. Scott & Sons

(Address)

3102 West End Avenue, Suite 1100

(Address)

Washville TN 37203

(Name)

(Address)

(Address)

(Name)

(Address)

(Address)

(Name)

(Address)

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(Address)

(Name)

(Address)

(Address)

on the *26th* day of *June*

2005

DR
[Signature]
Signature

Dr. Regina Jordan-Ludig

(Signature)

DR. REGINA JORDAN-LUDIG

(Print Name)

1757 Autumnwood Blvd

Clarksville TN 37042

(931) 561-2546

(Address & Telephone Number, if any)

6

Dr. Regina Jordan-Sodiq
1757 Autumnwood Blvd
Clarksville Tn. 37042

Waste Connections of Clarksville
Attn: Customer Care Department
2051 Wilma Rudolph Blvd.
Clarksville, TN 37040

June 26, 2025

Subject: Formal Request for Billing Classification History and Rate Increase Justification –
Account #6034-511047

Dear Waste Connections of Clarksville,

I am formally requesting a written explanation and full service history for my account (**#6034-511047**) in light of significant and unexplained increases to my monthly waste removal charges.

I have maintained uninterrupted residential service at the same address for over a decade. I have not requested changes in classification, bin size, pickup frequency, or added services. However, my billing history reflects the following:

- **March 2021** – billed \$11.00
- **March 2023** – billed \$67.00
- **June 2025** – billed \$82.08

At no point was I notified in writing of classification changes or rate increases, nor did I consent to such adjustments.

I therefore request the following be provided in writing:

1. My **current account classification** (residential or commercial)
2. Any **classification changes** since 2015, with effective dates and authorization records
3. A **timeline of rate changes** from 2015 through 2025 with explanations
4. A **line-item breakdown** of my June 2025 bill
5. **Representative invoices** from at least one billing cycle per year between 2015 and 2025
6. The **justification** for the rate increase between 2023 and 2025

This request is submitted as part of federal court proceedings (Middle District of Tennessee – Nashville Division) and must be fulfilled in writing within **10 business days** from receipt.

Sincerely,

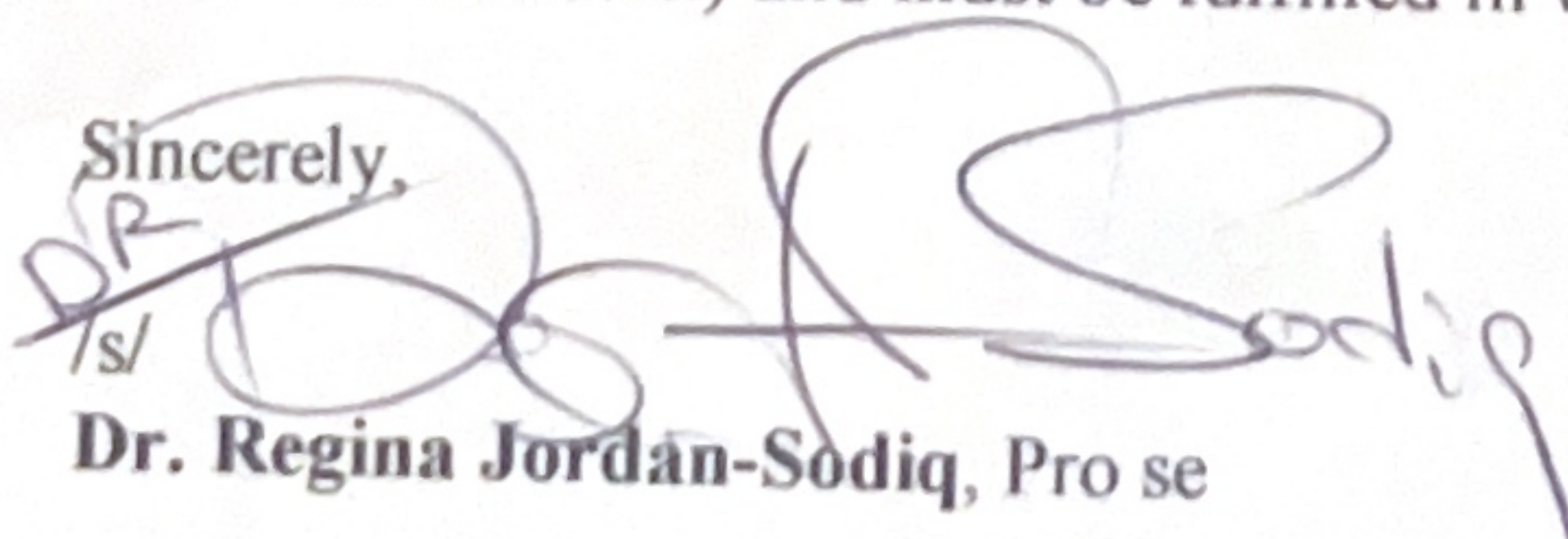

Dr. Regina Jordan-Sodiq, Pro se

Exhibit
A

A new invoice is available for your review. Simply click on www.wccustomer.com to view and pay your bill on line.

Customer Name: RICHIA JORDAN
Account Number: 6034-011007
Invoice Number: 4562367
Amount Due: \$ 00
Statement Date: 09/15/20

If you have set up recurring payments, this invoice will be paid automatically. To verify whether you have recurring payments, log in to www.wccustomer.com, then select *Payments*. If you have a recurring profile, select *Edit* to see the set up.

If you no longer wish to get this notification, login to www.wccustomer.com. After signing in, select *Notifications*. Remove the check mark by "Would you like to receive Email Notification when new documents become available online?" and click *Update*.

If you have any questions in regards to your invoice, please reply to this email or call us at 931-896-1500 or 931-552-3010.

Sincerely,
Queen City Disposal Customer Care Team

Exhibit
B:C

Waste Connections Service - Payment Reminder
From: alpf6034@wasteconnections.com
To: g4818@yahoo.com
Date: Wednesday, March 31, 2021 at 07:32 AM CDT

Message Body

Payment for your Queen City Disposal account is due soon. To view/pay your bill online, please log in to www.wcicustomer.com.

Account Number: 6034-511047
Invoice Number: 4721808
Amount Due: 11.00
Due Date: 04/05/21

Only payments made through our online bill pay site will be reflected on our site as paid. If you have made your payment using another method, we appreciate it, and please disregard this email.

If you feel your payment was made through the Waste Connections online bill pay site, and it is still showing as unpaid, please log in to www.wcicustomer.com to check your payments.

Should you require additional assistance, please reply to this email or call us at 931-896-1500 or 931-552-3010.

Thank you for using our online bill pay!

Sincerely,
Queen City Disposal Customer Care Team

Exhibit
D

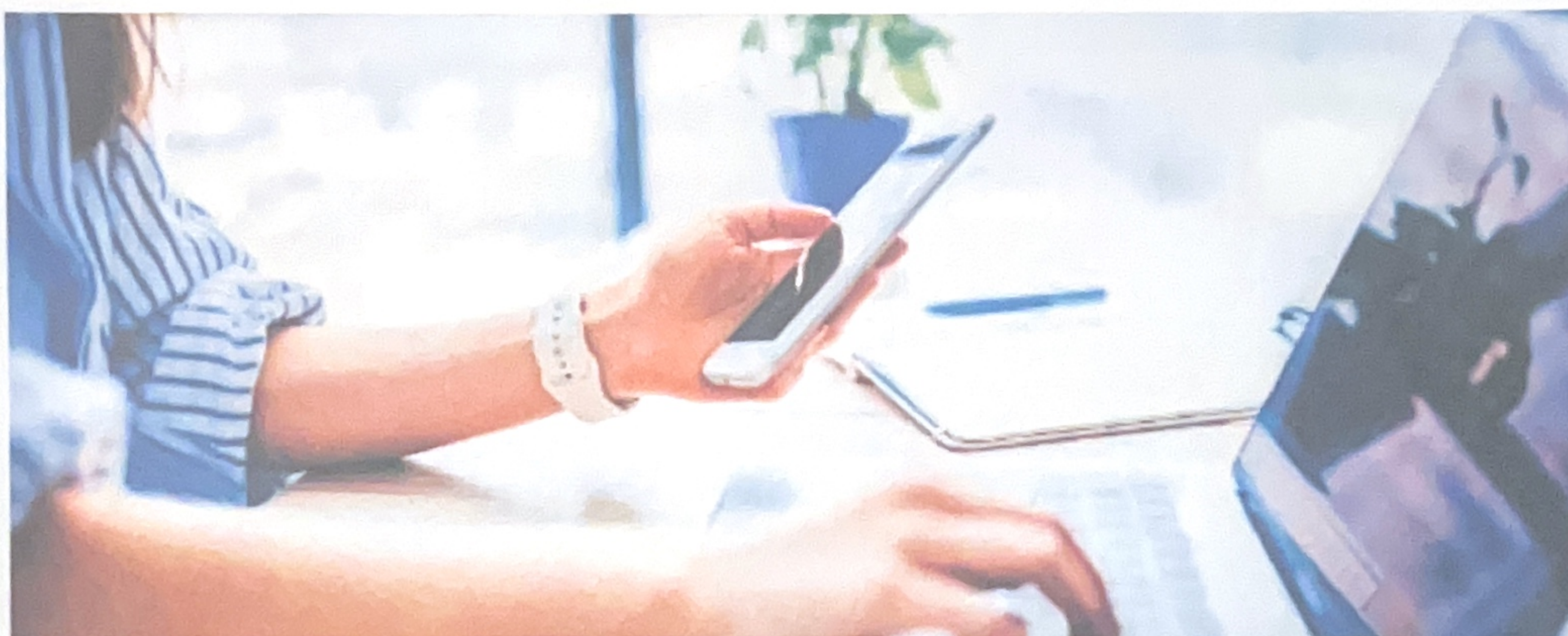


New Bill from Waste Connections Of Clarksville
From:olp6034@wcnx.org
To:g4818@yahoo.com
Date:Friday, March 17, 2023 at 12:29 AM CDT

Message Body



WASTE CONNECTIONS
Connect with the Future



New Invoice Notification

You have a new invoice ready for review.

[Log in to My Account](#) to review your full invoice or account details below and choose a method to pay your bill.

If you have set up autopay, the amount due will be paid automatically. You can set up automatic payments at [My Account](#).

If you have questions in regard to your invoice, please call us at 931-552-3010 or reply to this email.

REGINA JORDAN
Invoice Date: 03/15/23
Invoice Number: 5515016W034

Account Number: 6034-511047
Payment Due Date: 04/05/23
Amount Due: 67.37

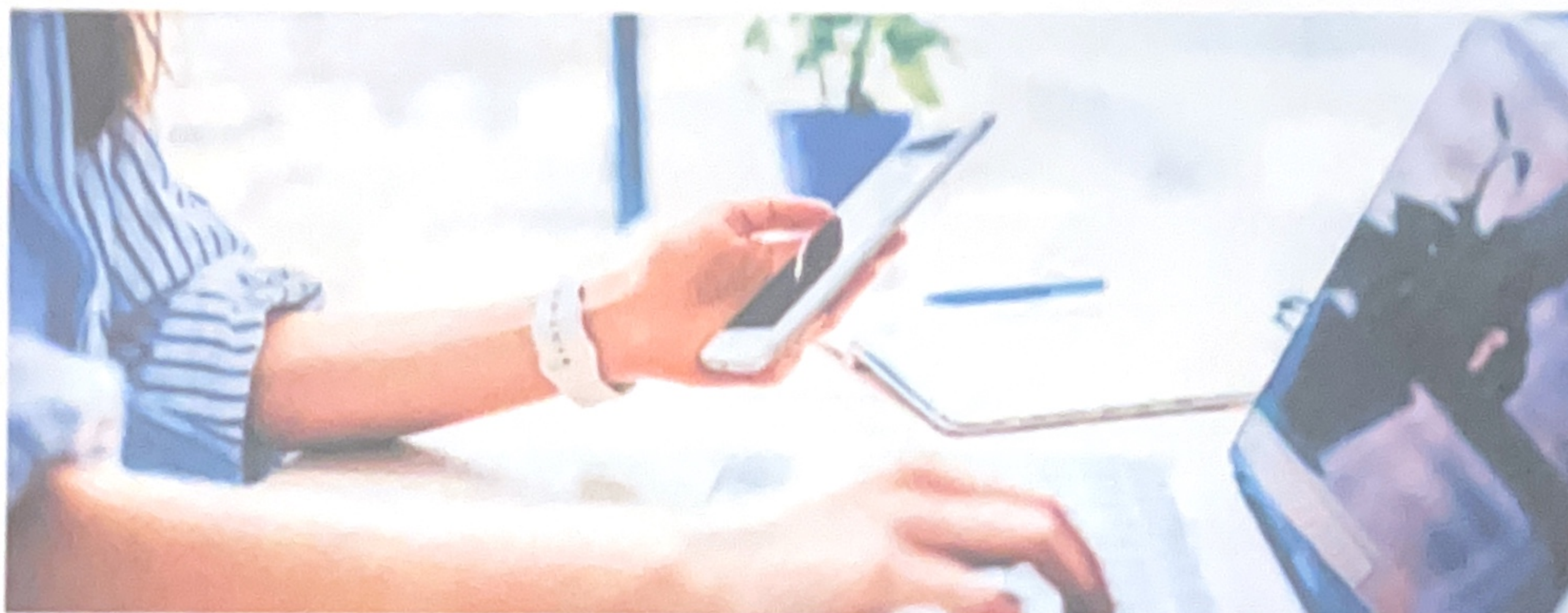
Feedback

New Bill from Waste Connections Of Clarksville
From:olp6034@wenx.org
To:g4818@yahoo.com
Date:Wednesday, September 20, 2023 at 06:16 AM CDT

Message Body



WASTE CONNECTIONS
Connect with the Future



New Invoice Notification

You have a new invoice ready for review.

[Log in to My Account](#) to review your full invoice or account details below and choose a method to pay your bill.

If you have set up autopay, the amount due will be paid automatically. You can set up automatic payments at [My Account](#).

If you have questions in regard to your invoice, please call us at 931-552-3010 or reply to this email.

REGINA JORDAN
Invoice Date: 09/18/23
Invoice Number: 5712646W034

Account Number: 6034-511047
Payment Due Date: 10/05/23
Amount Due: 80.36

Exhibit
F

Queen City Disposal - Approved Automatic Payment
From: qcd034@qcd.com
To: p4818@yahoo.com
Date: Thursday, June 19, 2025 at 07:04 AM CDT

Message Body



WASTE CONNECTIONS

Hello regina JORDAN,

Your Automatic Payment for 6034-511047 has been **Approved** and will be posted to your account.

Payment Date: 06/18/2025

Payment Amount: \$82.08

Pay with: *****1695

Confirmation Code: 2506182294818

Thank you for your payment. Should you wish to review your invoices or payments, please log in to [MyAccount Portal](#).

Please do not respond to this email. If you have any questions or concerns, please call 931-552-3010.

We appreciate the opportunity to manage your waste disposal needs.

Sincerely,
Queen City Disposal Customer Care Team

Exhibit
G